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May 10, 2024

VIA ELECTRONIC MAIL AND ECF FILING

Honorable Paul A. Engelmayer
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jane Street Group LLC v. Millennium Management LLC*, 24 C 2783 (PAE),
MOTION TO SEAL ANSWER AND COUNTERCLAIM

Dear Judge Engelmayer:

We represent Defendant Millennium Management LLC ("Millennium") in the above-referenced action. We write to request permission to seal certain materials that potentially contain the parties' proprietary, commercially sensitive, or trade secret information in Millennium's Answer to Jane Street Group LLC's Amended Complaint (D.I. 63) and Millennium's Counterclaim for a declaratory judgment of a bad faith claim of misappropriation under the Defend Trade Secrets Act of 2016.

Millennium disputes that Jane Street's Amended Complaint contains any trade-secret information or that Jane Street has articulated a viable trade-secret misappropriation theory. And Millennium disputes that any information that is publicly available should be redacted from public view as well.

Nonetheless, out of an abundance of caution, Millennium requests that its papers be filed under seal, in deference to the redactions in Jane Street's Amended Complaint. Millennium will confer with Jane Street regarding Jane Street's proposed redactions, and Millennium will file a public version of its Answer and Counterclaim by close of business on May 14, 2024. Millennium reserves the right to challenge the redactions in the Amended Complaint and to later revise the redactions to Millennium's Answer and Counterclaim.


Respectfully submitted,

/s/ Andrew J. Levander

Andrew J. Levander

GRANTED.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

cc: All Counsel of Record via ECF

Dated: June 10, 2024
New York, New York